

RACHEL PENSKI FISSELL rfissell@walfishfissell.com +1.212.672.0523 405 Lexington Avenue, 8th Floor New York, NY 10174 www.walfishfissell.com

March 2, 2022

This request is granted. Plaintiff shall file a status letter by April 1, 2022, updating the Court on how it plans to proceed.

Hon. John P. Cronan United States District Court Southern District of New York 500 Pearl St. New York, NY 10007

SO ORDERED. Date: March 2, 2022 New York, New York

JOHN P. CRONAN United States District Judge

Re: Lebanese Co. for Financial Investment SAL v. Córporación Eléctrica Nacional,

Case 1:21-cv-09173

Dear Judge Cronan:

Per the Court's order, dated January 31, 2022 (ECF No. 17), we write this status letter on behalf of Plaintiff in the above-referenced matter. As we previously informed the Court (ECF No. 16), Defendant has not appeared in the matter and Defendant's contractually appointed agent to receive and forward a summons (see ECF No. 1-1 § 9.10(b)) declined to forward the Summons and Complaint to Defendant.

Plaintiff is continuing to review the next steps, if any, that may be required under 28 U.S.C. § 1608(b). In addition, Plaintiff has had some difficulty in paying the undersigned counsel due to certain capital controls in place in Lebanon, where Plaintiff is based. In light of Plaintiff's financial situation and of the potential complexities surrounding effectuation of service on a Venezuelan state-owned entity such as Defendant here, Plaintiff respectfully requests an additional 30 days in which to update the Court on its plans.

Respectfully submitted,

Rachel Penski Fissell